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Sent: Monday, February 28, 2005 7:40 PM

To: MLPAComments@resources.ca.gov

Subject: MLPAComments: BRTF Master Plan Framework comment letter

Mr. Phil Isenberg, Chair
MLPA Blue Ribbon Task Force
1416 Ninth Street, Suite 1311
Sacramento, CA 95814
Attn: Melissa Miller-Henson

Chairman Isenberg and BRTF Members:

The Master Plan Framework needs to address the problems for the environment that can occur from MPAs such as:

1. What happens to displaced fishing?
2. The need to better identify the organisms that can, and cannot benefit.
3. What options other than MPAs are available.

These questions come from a paper written by Ray Hilborn, who is one of the most respected fishery biologist on the West Coast. It is interesting to note that none of the work of Dr. Hilborn are cited as references in the Draft Master Plan Framework. This process and the Framework must embrace both the Advocacy of science and also its healthy skepticism.

The Science Team must be well balanced, to inspire confidence that a fair discussion will occur. There needs to be more participation from scientists who work in the real world of fishery management, and fishery sociology and economics, even if a couple of the fish ecologists are dropped. It is critical that there be public confidence in the Science Team. Additionally, the Task Force should set the mechanism for a peer review of all Science Team products.

The Task Force should have a discussion about who are stakeholders in this process. Understanding that every citizen in the State of California could be considered a stakeholder, it is nevertheless true that some stakeholder groups who directly utilize the ocean have potentially much to lose or much to gain from the outcome of this process. Fishermen and coastal communities have potentially much to lose if they are essentially put out of business or their infrastructure deemed useless. Likewise, scientists working for environmental NGOs or institutions, potentially have much to gain via research and publication opportunities that might occur from a substantially expanded system of MPAs. Environmental organizations are stakeholders in that the outcome of this process is a defined product delivered to their members. The Task Force needs to have this discussion and clearly identify complimentary and competing stakeholder interests.

Non-human impacts, such as sea lion and sea otter predation must also be fully taken to account in the Master Plan framework. For example, if a goal of an MPA was to enhance the population of red abalone, this goal must take into account the presence of sea otters, which eat red abalone.

In order for the Task Force, and the MLPA Initiative process generally to proceed in a thorough and informed manner, the process can not be rushed. Right now, the time lines seem unrealistic by any standard. All stakeholders will benefit from sufficient time being available for their concerns to be fully presented and considered.

The Task Force should formally request that the Science Team follow the MLPA language and begin their work with a report to the Task Force on the Status of existing MPAs.

The Task Force should be sure to hear a full report on the status of existing fishing regulations and closures. This report must include an analysis of how each regulation (or category of regulations) may meet or contribute to the goals of the MLPA.

Please accept these suggestions on the MLPA Initiative process.

Regards,
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Fishing Vessel SEEADLER. Home port, Moss Landing California: Owner
Operated for the purpose of catching and selling fish wholesale with the following California State permits. Permits are available to users who have either fished them before or bought the right from another fisherman to fish them. Such as:
<http://www.dockstreetbrokers.com/>
Our California fisheries: pot Dungeness Crab, troll Salmon, troll and live bait Albacore, driftnet Swordfish and Shark, longline Sablefish, San Francisco gill net Herring, and seine Market Squid. Featured article on crab,
http://www.triplicate.com/news/story.cfm?story_no=1580 Another member of our family owns the Fishing Vessel Vinland, fishing similar fisheries.
Thank you.